

Exhibit 20

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF TEXAS
3 AUSTIN DIVISION
4

5 KATHY CLARK, AMY ENDSLEY, SUSAN
6 GRIMMETT, MARGUERIETTE SCHMOLL,
7 and KEVIN ULRICH, on behalf of
8 themselves and all others
9 Similarly situated,

10
11 Plaintiffs,

12

13 vs.

No. 1:12-CV-00174-SS

14

15 CENTENE CORPORATION, CENTENE
16 COMPANY OF TEXAS, L.P., and
17 SUPERIOR HEALTHPLAN, INC.,
18
19 Defendants.

20 DEPOSITION OF TRICIA DINKELMAN,
21 taken on behalf of the Plaintiffs, at the offices of
22 Armstrong Teasdale L.L.P., 7700 Forsyth Boulevard,
23 Suite 1800, St. Louis, Missouri, on the 24th day of
24 October, 2012, before Gretta G. Cairatti, RPR, CRR,
25 MO-CCR #790, IL-CSR #084-003418, and Notary Public.

1 for Mr. Neidorff. I don't even suspect Mr. Neidorff
2 would be in a position to walk through the
3 organizational chart. It just doesn't fall within
4 his realm of knowledge, where it does fall within
5 Miss Dinkelman's realm of knowledge.

6 **MR. LANGENFELD:** The organizational chart.

7 **MR. KAISER:** Well, the organizational chart,
8 the relationship between the different subsidiaries,
9 particularly the legal relationship between the
10 different subsidiaries.

11 **MR. LANGENFELD:** Well, let's go ahead and
12 break for lunch.

13 **MR. KAISER:** Okay.

14 (Lunch recess taken.)

15 **QUESTIONS BY MR. LANGENFELD:**

16 **Q** Miss Dinkelman, when we first got started
17 and I showed you the organizational chart, you
18 circled some subsidiaries that had utilization
19 review nurses employed?

20 **A** Yes.

21 **Q** Do you understand the primary duty or the
22 job duties of utilization review nurses?

23 **A** No. I mean, I understand that the nurses
24 have some responsibility to review claims that are
25 submitted to -- you know, depending on what legal

1 entity that they work for, related to a particular
2 contract with a state agency, but I do not have
3 knowledge of their detailed --

4 **Q** But you feel comfortable enough in knowing
5 what they do to tell us that they're employed by the
6 subsidiaries that you've circled?

7 **A** Yes.

8 **Q** And you testified to that as the corporate
9 rep of Centene Corporation; is that right?

10 **A** No, the corporate rep of Centene Corporation
11 would not have knowledge to that. I believe I made
12 that statement when we kind of switched over to
13 the -- the -- the discussion.

14 **Q** Well, did you testify to that as a corporate
15 rep of Superior?

16 **A** No, Superior would not have -- Superior
17 would have knowledge of Centene Company of Texas.
18 Superior would not have knowledge of the -- the
19 other organizations.

20 **Q** So when you testified to that organizational
21 chart and made those circles, which hat were you
22 wearing?

23 **A** I was talking as Tricia Dinkelman at that
24 time because I thought I was supposed to assist with
25 the understanding of the org chart as that's my --

1 part of my job responsibility.

2 **Q** Okay. So it's your testimony that a
3 representative of Centene Corporation would not have
4 that information.

5 **A** That's correct.

6 **Q** Let me show you a document that's entitled,
7 Defendants Second Supplemental Objections and
8 Answers to Plaintiffs First Set of Interrogatories
9 to Defendant Centene Corporation.

10 **MR. LANGENFELD:** In fact, let's go ahead and
11 mark that.

12 (Pleading's Exhibit No. 5 marked for
13 identification.)

14 **QUESTIONS BY MR. LANGENFELD:**

15 **Q** Interrogatory number 1, go ahead and read
16 that to yourself, please.

17 **MR. KAISER:** I assume you don't have extra
18 copies?

19 **MR. LANGENFELD:** I don't. I didn't, quite
20 frankly, anticipate this happening.

21 **MR. KAISER:** So if you don't mind, I'll just
22 look over your shoulder. Interrogatory number 1?

23 **QUESTIONS BY MR. LANGENFELD:**

24 **Q** Interrogatory number 1 generally asks to
25 I -- describe the job duties and to identify what